

PD4 Exh 4

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL )  
5 PRESCRIPTION ) MDL No. 2804  
6 OPIATE LITIGATION )  
7 \_\_\_\_\_ ) Case No.  
8 ) 1:17-MD-2804  
9 )  
10 THIS DOCUMENT RELATES ) Hon. Dan A.  
11 TO ALL CASES ) Polster  
12 )

13 FRIDAY, JULY 13, 2018

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Shirlene  
18 Justus, held at the offices of BakerHostetler  
19 LLP, 200 South Civic Center Drive, Columbus,  
20 Ohio, commencing at 9:05 a.m., on the above  
21 date, before Carrie A. Campbell, Registered  
22 Diplomate Reporter and Certified Realtime  
23 Reporter.

24 - - -

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1           that it should not happen.

2                   MR. FULLER:   Evan, let's go to  
3           macro number 2.

4   QUESTIONS BY MR. FULLER:

5           Q.       This is the suspicious order  
6   reporting but this time for a Skilled Cared  
7   Pharmacy.

8                   Do you see that?

9           A.       I do.

10          Q.       And then the order is for the  
11   Skilled Care Pharmacy, same address, same  
12   customer DEA number, right?

13          A.       Yes, I agree.   Yes.

14                  MR. FULLER:   If you move to the  
15   right for me.

16   QUESTIONS BY MR. FULLER:

17          Q.       And the date of the suspicious  
18   order report or overage is February 14th, and  
19   then product from the same drug family was  
20   shipped on the 18th and 22nd.

21                  Do you see that?

22          A.       I do.

23          Q.       Now, you would expect to see  
24   some sort of explanation again in the  
25   diligence file; is that right?

1 MS. WICHT: Object to the form  
2 of the question and no foundation.

3 THE WITNESS: It should be  
4 there.

5 QUESTIONS BY MR. FULLER:

6 Q. Okay. And was that your  
7 standard practice?

8 If you were going to change a  
9 threshold or if you were going to clear  
10 something or allow future shipments to go  
11 through, you would have documented your  
12 reasoning behind that, why you were doing  
13 that?

14 MS. WICHT: Object to the form  
15 of the question.

16 QUESTIONS BY MR. FULLER:

17 Q. Correct?

18 A. I should have, yes.

19 Q. That was your normal procedure?

20 A. Yes, that would have been what  
21 I should have done, yes.

22 Q. Okay. And you -- sitting here  
23 today, you don't know whether you did or  
24 didn't?

25 A. I have no idea whether I did or